

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
GARMIN INTERNATIONAL INC.)	WT Docket No. 01-339
)	
Amendment of Section 95.193(a) and 95.631(d))	RM - 10070
To Authorize manufacture, Sale and Use of GPS)	
Transmission Enhanced Family Radio Service)	
Units)	
)	
)	
Amendment of Section 95.193(a), 95.193(b))	
and 95.631(d) of the Commission's Rules)	
Governing Permissible Communications in the)	
Family Radio Service)	

REPLY COMMENTS ON NOTICE OF PROPOSED RULEMAKING

Comment Date: February 27, 2002

To: The Commission

COMMENTS OF

Northern California GMRS Users Group (NCGUG)
Gregory J. Forrest, P.E. (KAF1291) - Author

Suzanne Nomura (KAF1291)
Doug Smith, Editor of Popular Wireless Magazines (KAF9830)
Paul Shinn, P.B.E. (KAF8333)
Anne and Edward Borden (KAF3625)
Karen and Ricco Lorenzi (KAF4428)
Mike Moran (KAF4349)
Jane and Tom Forrest (KAF4364)
Brett Sharenow (WPQY281)

COMMENTS

1. We have reviewed comments filed by Garmin International, Inc. dated February 13, 2002, and comments by the Personal Radio Steering Group, Inc. (PRSG) dated February 11, 2002.

2. The NCGUG found several aspects of the PRSG's comments to be especially important. In particular, we concur with the PRSG¹ that there is a potential for abuse by users who wish to connect external devices to the FRS radio, and we support PRSG's suggestions on further rule clarifications.

3. PRSG argues that all data generating components must be strictly internal to the FRS unit.² We concur with this simple requirement. Many if not most FRS units have a port that is intended for use with an external microphone with push-to-talk (PTT), or where the PTT action is voice-operated (VOX). Although users are not permitted to attach other "apparatus to an FRS unit that has not been FCC certified as part of that FRS unit" (§95.193[c]), such a port allows for the simple attachment of an external device none-the-less. However, there are methods to acoustically or inductively couple external signals into the FRS unit, which could fall outside the current "attachment" restrictions.

4. Therefore, there is a distinct possibility that an external GPS receiver, such as those applied on large transit fleets or on moving inventory could be coupled to an FRS unit.

5. Furthermore, companies selling such location determination products could successfully argue that the location data they are coupling into the FRS unit is not "digital" data but "analog" data. Analog data can consist of discreet tones that would then be restricted only to a 15-second duration (§95.193[b]). Large fleets would completely load these channels as the NCGUG cited in its earlier comments.

6. The PRSG also suggests that no FRS unit shall transit an F2D emission unless that unit is certified for use with a GPS unit internal to that unit. The PRSG correctly argues that a further loophole exists where an FRS unit could be certified for F2D emissions, but not be equipped with an internal GPS receiver. This would further encourage coupling of external analog or digital data into FRS units.

7. Finally, we concur with Garmin's comments that the "manual key press" is too restrictive. We support Garmin's claim that there should be various ways to initiate a location transmission to permit more flexibility. However, as the NCGUG noted in our earlier comments, we do not support units capable of being externally polled.

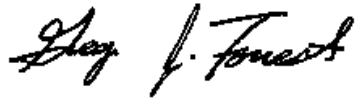
8. If the FRS user is unable to speak or depress a button, it is still not necessary to poll the unit. A "man-down" type position switch could be installed to sense when the FRS unit is horizontal for a period of time, or if there had been no physical movement (an accelerometer or movement sensor could be used).

¹ PRSG's comments at Paragraphs 29 through 35.

² See the Section X of PRSG's comments.

Respectfully Submitted,

By: Gregory J. Forrest, P.E.

A handwritten signature in black ink, reading "Greg J. Forrest". The signature is written in a cursive, flowing style.

Chairman, Northern California GMRS Users Group (NCGUG)

NCGUG

Gregory J. Forrest, P.E.

1777 Oakland Blvd., Suite 101

Walnut Creek, CA 94596

(925) 210-1500 X222

crossmod@attbi.com

We have serviced the PRSG (via email) and Garmin International.

END